



FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

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2013 MAR 18 PM 2:31

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March 15, 2013

MEMORANDUM

SENSITIVE

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COMMISSION
SECRETARIAT

TO: The Commission

FROM: Anthony Herman
General Counsel

Daniel Petalas
Associate General Counsel for Enforcement

Kathleen Guith
Deputy Associate General Counsel for Enforcement

BY: William A. Powers *WAP*
Assistant General Counsel

Kasey S. Morgenheim *KSM*
Attorney

SUBJECT: MUR 6709 (Bachmann for Congress)

RE: Pre-Probable Cause Conciliation Agreement

I. INTRODUCTION

On December 18, 2012, the Commission found reason to believe that Bachmann for Congress and Daniel Puhl in his official capacity as treasurer (the "Committee"), violated 2 U.S.C. § 434(b) by failing to disclose all of its receipts and disbursements. See RR 12L-14 Certification (Dec. 20, 2012). The Commission authorized us to attempt to settle the violations through pre-probable cause conciliation.

1. We recommend the Commission accept the signed agreement.

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26 We believe that the conciliation agreement is a fair resolution of this matter and
27 recommend that the Commission accept the agreement.
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29 **III. RECOMMENDATIONS**
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- 31 1. Accept the attached conciliation agreement with Bachmann for Congress and
32 Daniel Puhl in his official capacity as treasurer.
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34 2. Approve the appropriate letters.
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36 3. Close the file.
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